

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION
No. 5:24-cv-00152-KDB-SCR**

ENTERPRISE FM TRUST,

Plaintiff,

v.

RMCDJR, LLC *et al.*,

Defendants.

**PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

Plaintiff Enterprise FM Trust (“Enterprise”) moves under Federal Rule of Civil Procedure 65(a) for a preliminary injunction barring Defendants RMCDJR, LLC (“Randy Marion”), Corey Richard (“Detective Richard”), and the Town of Mooresville from further interference with Enterprise’s property rights in the thirty-four 2023 RAM ProMaster 3500 High Roof Extended Cargo Vans identified in Exhibit B to the accompanying Brian Ritter Declaration. Enterprise specifically requests that Detective Richard be ordered to remove the National Crime Information Center listing identifying those Cargo Vans as stolen.

Counsel for Enterprise certifies under LCvR 7.1(b) that they have conferred with counsel for Detective Richard and the Town of Mooresville and attempted in good faith to resolve areas of disagreement. Counsel for Randy Marion has not yet entered an appearance in this case.

Dated: July 2, 2024

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

/s/ Christopher W. Jones

Christopher W. Jones

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CERTIFICATE OF FILING AND SERVICE

I certify that on July 2, 2024, I caused this document to be served on counsel for Defendants Corey Richard and the Town of Morrisville by filing it with the Court's electronic-filing system.

I further certify that on July 2, 2024, I caused this document to be served on Defendant RMCDJR, LLC by mailing it to Randall L. Marion, PO Box 1559, Mooresville, NC 28115.

Dated: July 2, 2024

/s/ Christopher W. Jones
Christopher W. Jones